



Department of Energy

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Mr Gary Baughman
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Gentlemen.

This letter is to request an extension for the Interagency Agreement (IAG) Table 6 milestone date of April 4 1993 for the Remedial Investigation (RI) Report for Operable Unit No 1 (OU1). There are two primary reasons for this extension (1) extensiveness of comments and inability to reach a conclusion within 60 days allotted for resolution, and (2) sampling and analysis of additional hot spots identified by the High Purity Germanium (HPGe) survey recently completed.

In preparing the revised schedule for the submission of the OU1 Final RI report, we have incorporated the following changes that we have already agreed to with the Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH)

- revision of the report to clarify the Individual Hazardous Substance Sites (IHSSs) 102 location
- inclusion of the residential scenario into the risk assessment
- extensive revisions to the form and format of data presentation in the report
- inclusion of an additional section of the report addressing the data validation activities and results

We have also identified 10 assumptions, Enclosure 1 that directly impact the revised schedule. Based on the enclosed assumptions the critical path for completion of the Final RI Report is the investigations of the hot spots. Two elements are critical within that part of the schedule Confirmation of the hot spots by a field instrument for detection of low-energy radiation (FIDLER) survey and laboratory analysis and data validation.

The FIDLER survey is very sensitive to weather conditions and cannot be conducted if there is snow cover or during high winds. Therefore we have established a staffing priority that will enable us to double number of crews if necessary to meet the field schedule.

ADMIN RECORD

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We have compressed the lab analysis schedule from 90 working days to 36 working days by arranging for the exclusive use of an off site lab. We have their written commitment that this schedule can be met.

Based on the above the working schedule Enclosure 2 for completion of the Final RI Report for OU1 and delivery to EPA/CDH is November 1 1993. However we recommend that the commitment schedule should be November 15 1993. The two week contingency is related to the uncertainties remaining with the sample collection and laboratory analysis and data validation activities and the need to ensure quality of this report as a template for future reports.

This schedule is dependent upon the successful resolution with EPA/CDH of the positions shown in Assumptions 3 and 4 by no later than May 15. If we do not come to agreement with EPA/CDH regarding the selection of the background site (Rock Creek) or if the regulatory agencies require any additional significant changes, this schedule will have to be reassessed. Any delays beyond that date will result in a day for day slip in schedule. Also the dates for submittal of the draft and final feasibility study (FS) reports will need to be extended to April 2 1994 and October 2 1994.

Sincerely


A. H. Paulic
Acting Manager

Enclosures

cc w/o Enclosures
R. Schassburger ERD RFO
P Singh ERD RFO